

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
) 4:21-cr-00528
vs.)
)
BRITTISH WILLIAMS)

MOTION TO EXTEND SURRENDER DATE

Comes now the Defendant, BRITTISH WILLIAMS, by and through her attorney, Beau B. Brindley, and moves this Honorable Court to extend the her surrender date by 30 days. In support, she states as follows.

1. Ms. Williams is scheduled to surrender into custody on December 11, 2023.
2. She is the sole caregiver for her five-year-old daughter. Her daughter needs to have a children's therapist to aid in the upcoming transition. Ms. Williams and her mother have been working to get her into the best therapist they can find for the child. That process is ongoing and can be completed within 30 days. Ms. Williams needs to be there with her daughter for the initial session.
3. Ms. Williams's mother is going to be taking custody of the child while she is incarcerated. However, she needs to get a suitable place of residence that she can afford. Ms. Williams and her mother have been working to find the necessary place. They believe that she will be able to move in by the end of December. A little more time is needed to get a suitable living space for them. They have been working on it. They will not need more than a 30 day extension to get all of these issues finalized.
4. Lastly, the Christmas holiday is almost upon us. Ms. Williams's five-year-old daughter

desperately wants to be able to spend it with her mother. As she is preparing for this transition, it would mean a great deal for them to have that time together.

5. A 30-day extension of the surrender date will permit Ms. Williams to get her daughter into the therapist, to get her mother and daughter into a suitable new living space that is not yet available, and to spend the holiday with her daughter before going into custody. Ms. Williams will not request another extension of the surrender date.

6. The undersigned has contacted both government counsel and Ms. Williams's pretrial services officer to inquire into their positions on this motion. Neither stated an affirmative position. Government counsel said she would defer to Pretrial Services and the Court. Officer Dade said she would defer to the Court.

WHEREFORE, Defendant British Williams respectfully moves this Court to extend her surrender date to January 11, 2024.

Respectfully submitted,
Brittish Williams
By: s/ Beau B Brindley

LAW OFFICES OF BEAU B. BRINDLEY
53 West Jackson Blvd.
Suite 1410
Chicago, Illinois 60604
312.765.8878

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused a true and correct copy of the attached document to be served upon the government by electronically serving it through the CM/ECF system on December 4, 2023.

s/ Beau B. Brindley

THE LAW OFFICES OF BEAU B. BRINDLEY
53 West Jackson Blvd.
Suite 1410
Chicago, Illinois 60604
(312) 765-8878